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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JULIAN TOCKER, an individual,

Plaintiff,

vs.

OFFICER ZACHARY GAINEY, an individual;
OFFICER E. ANDERSON, an individual; LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision; DOES
1 through 10; and ROE CORPORATIONS 1
through 10, inclusive,

Defendants.

CASE NO: 2:25-cv-01050-ART-MDC

**STIPULATION AND ORDER TO EXTEND
THE DEADLINE TO FILE MOTIONS TO
AMEND PLEADINGS OR TO ADD
PARTIES**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED between the parties and their undersigned attorneys that the deadline to file motions to amend the pleadings or to add parties is November 3, 2025, be continued for a period of thirty (30) days from the Court's prior Order (ECF No. 19).

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

In progression of the case, Plaintiff has received surveillance footage from Tao Group and Omnia Nightclub in response to a subpoena served and deposed Defendants Officer Zachary Gainey and Officer E. Anderson. Defendants' Counsel has requested additional time to respond to Plaintiff's initial written discovery in which Plaintiff's Counsel has approved the new deadline. However, this deadline falls on the same deadline to file motions to amend pleadings or to add parties in which

Plaintiff's Counsel believes the Defendants' responses will be helpful in amending the complaint.

WHEREFORE, the parties respectfully request that this Court extend the time to file motions to amend pleadings or to add parties by thirty (30) days from the current deadline of November 3, 2025, up to and including December 3, 2025.

This request for an extension is made in good faith and joined by all the parties in this case. The Request is timely pursuant to LR 26-3. Trial is not yet set in this matter and dispositive motions have not yet been filed. Accordingly, this extension will not delay this case. Since this request is a joint request, no party will be prejudiced.

IT IS SO STIPULATED AND AGREED.

DATED this 13th day of October, 2025.

DATED this 13th day of October, 2025.

LAGOMARSINO LAW

KAEMPFER CROWELL

/s/ Cristina P. Valentine, Esq.

/s/ Kristopher Kalowski, Esq.

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ORDER

IT IS SO ORDERED.

By: 

Hon. Maximiliano D. Couvillier, III
UNITED STATES MAGISTRATE JUDGE

Dated: October 16, 2025